

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

GRAND STRAND WATER & SEWER AUTHORITY, on behalf of itself and all others similarly situated,

Plaintiff,

vs.

OLTRIN SOLUTIONS, LLC, JCI JONES CHEMICALS, INC., and TRINITY MANUFACTURING, INC.,

Defendants.

Case No. 4:14-CV-2800-RMG

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND AUTHORIZATION TO DISSEMINATE NOTICE**

**PLEASE TAKE NOTICE** that Plaintiff Grand Strand Water & Sewer Authority, on behalf of itself and the Settlement Class Members defined in the Settlement Agreement (collectively, “Plaintiffs”), and Defendants Oltrin Solutions, LLC (“Oltrin”), JCI Jones Chemicals, Inc. (“JCI”), and Trinity Manufacturing, Inc. (“Trinity”) have reached a preliminary Settlement, and Plaintiffs hereby move unopposed under Federal Rule of Civil Procedure 23(e) for an Order: (1) preliminarily approving the settlement embodied in the class action Settlement Agreement; (2) certifying the settlement class; and (3) authorizing the dissemination of Notice. In support of this Motion, Plaintiffs rely on the reasons and authorities set forth in their accompanying Memorandum of Law filed contemporaneously herewith and the exhibits thereto. As set forth more fully in the foregoing Memorandum of Law: (1) the proposed Settlement falls within the range of possible approval as fair, reasonable, and adequate; (2) the proposed

Settlement Class meets the requirements of Fed. R. Civ. P. 23(a) and 23(b)(3); and (3) and Plaintiffs' proposed Class Notice Plan is reasonable.

November 23, 2015

Respectfully submitted,

/s/ Henrietta U. Golding

---

Henrietta U. Golding, Fed ID# 2125  
**McNair Law Firm, P.A.**  
2411 N. Oak Street, Suite 206 (29577)  
Post Office Box 336  
Myrtle Beach, SC 29578-0336  
Tel: (843) 444-1107  
hgolding@mcnair.net

Solomon B. Cera  
Pamela A. Markert  
**Cera LLP**  
595 Market Street, Suite 2300  
San Francisco, CA 94105-2835  
Tel: (415) 977-2230  
scera@cerallp.com  
pmarkert@cerallp.com

Brent W. Johnson  
Emmy L. Levens  
Hiba Hafiz  
**Cohen Milstein Sellers & Toll PLLC**  
1100 New York Ave. NW  
Suite 500, West Tower  
Washington, DC 20005  
Telephone: (202) 408-4600  
bjohnson@cohenmilstein.com  
levens@cohenmilstein.com  
hhafiz@cohenmilstein.com

Daniel E. Gustafson  
Daniel C. Hedlund  
**Gustafson Gluek, PLLC**  
Canadian Pacific Plaza  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Tel: (612) 333-8844  
dgustafson@gustafsongluek.com  
dhedlund@gustafsongluek.com

*Attorneys for Plaintiff Grand Strand Water Authority and the Proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 23, 2015, I electronically filed **PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND AUTHORIZATION OF DISSEMINATION OF NOTICE** with the Clerk of the Court using the ECF, who in turn sent notice to Counsel of Record.

Dated: November 23, 2015

/s/ Henrietta U. Golding  
Henrietta U. Golding